

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

Great Northern Utilities, Inc.	)	Docket Nos.	11-0059, 0141, 0142
Camelot Utilities, Inc.	)		(cons.)
Lake Holiday Utilities, Corp.	)		
	)		
Proposed Increase in Water and	)		
Sewer Rates	)		

**DRAFT PARTIAL PROPOSED ORDER OF  
THE PEOPLE OF THE STATE OF ILLINOIS**

**The People of the State of Illinois**

**By LISA MADIGAN, Attorney General**

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The People of the State of Illinois, by LISA MADIGAN, Attorney General of the State of Illinois (the “People,” or “AG”), pursuant to the request of the Administrative Law Judge, submit this Partial Draft Proposed Order in connection with the rehearing addressing rate shock mitigation.

**I. BACKGROUND**

In December, 2010, Great Northern Utilities, Inc. (“Great Northern” or “GNUI”), Camelot Utilities, Inc. (“Camelot” or “CUI”), and Lake Holiday Utilities Corporation (“Lake Holiday” or “LH”) (collectively, “Utilities, Inc.”, “UI”, or “the Companies”) filed tariffs seeking a general increase in water and/or sewer rates. On January 20, 2011 and February 9, 2011, the Commission entered Suspension Orders commencing the investigation concerning the propriety of the Companies’ requests for rate increases and on May 18, 2011 the Commission entered a Resuspension Order extending the suspension through November 29, 2011.

On November 8, 2011, the Commission entered a Final Order in which it allowed the following increases in revenues for each of the Utilities:

**Revenue Increases Approved in November 8, 2011 Final Order**

Final Order Amounts	Present Revenue	Revenue Increase	New Revenues	% Change
Great Northern Water	\$90,962	\$231,287	\$322,249	254%
Camelot Water	\$75,339	\$162,124	\$237,463	215%
Camelot Sewer	\$106,044	\$ 94,259	\$200,303	89%
Lake Holiday Water	\$443, 578	\$219,616	\$663, 194	50%

Sources: Appendices A, B, C, and D to Final Order (Nov. 8, 2011).

The People of the State of Illinois and the Camelot Homeowners Association both filed Applications for Rehearing, requesting rehearing on both the size of the revenue increase and on rate shock mitigation. The Commission granted rehearing solely on the issue of rate shock mitigation on December 22, 2011. Thereafter a schedule was set and the Utilities, the Staff, the People of the State of Illinois, and the Camelot Homeowners Association filed Direct Testimony on Rehearing. The Utilities and the Staff filed Rebuttal Testimony on Rehearing.

The Utilities filed direct testimony of Lena Georgiev and Rebuttal Testimony of Dmitry Neyzelman. Mr. Neyzelman adopted Ms. Georgiev's testimony at the hearing and answered cross-examination questions regarding both the Utilities Direct and Rebuttal Testimony. These witnesses testified against the adoption of a rate mitigation plan or phase-in plan, on the grounds that the Utilities are entitled to their revenue requirement, that a phase-in plan will impose administrative costs, will increase uncollectibles, and will result in intergenerational inequity. Mr. Neyzelman also testified that the interest rate proposed in the Staff and the AG plans was too low.

The Staff offered the Revised Direct and Revised Rebuttal Testimony of Philip Rukosuev. The Staff witness made a primary and a secondary recommendation concerning the rate mitigation issues for this proceeding. The primary recommendation is that the Commission refrain from adopting a program at this time to mitigate rates. However, if the Commission decides to adopt a rate mitigation plan, Staff's secondary recommendation is adoption of its Rider BSA (Bill Stabilization Adjustment) for Great Northern and Camelot water and sewer rates, which is patterned after Commonwealth Edison's ("ComEd") Rider RRS with certain modifications as set forth in ICC Staff Exhibits 17.0 REVISED and 18.0

REVISED. Staff also recommended that the Commission open an investigation into the cost of service of all of the Utilities, Inc. systems in Illinois that are affiliated with the Utilities at issue in this docket.

The People offered the Direct Testimony of Michael L. Brosch, who offered a rate phase-in plan and the direct Testimony of Scott J. Rubin, who recommended that the Commission open an investigation into all 23 of Utilities, Inc. Illinois water and wastewater systems to investigate the cost of service of the UI systems. AG witness Brosch proposed a phase-in plan for Great Northern and Camelot water and sewer rates so that each year rates increase by the greater of 20% or \$10.00 per month. This results in a phase-in period of about nine years for the Camelot and Great Northern increases and six years for the Camelot sewer rate increase. AG witness Rubin recommended that the Commission open an investigation into the cost of service of all of the Utilities, Inc. systems in Illinois that are affiliated with the Utilities at issue in this docket to determine whether efficiencies or rate mitigation can be achieved by reviewing the UI system as a whole.

The Camelot Homeowners Association filed the Direct Testimony of ten Camelot residents: Daisy Austin, Lou Chignoli, Connie Larson, Jim Levenson, Bebbe Marion, Stacy M. Nava, James K. Simmons, Cathleen M. Vallarta, Natalie Walsh, and Tessa Werve. These residents described the effect of the rate increases on their family budgets and how much of an increase they believed they could pay. The size of the increases varied from 10-15% to 70-80%, with Ms. Larson suggesting “a comparison should be made with other utilities such as natural gas and electricity,” and Mr. Levenson testifying that he would “pay a competitive rate for good water.”

The Utilities, the Staff, the People of the State of Illinois and the Camelot Homeowners Association filed Initial and Reply Briefs on Rehearing.

## **II. THE NEED FOR RATE MITIGATION**

On December 21, 2011 the Commission ordered rehearing in this docket to explore options to alleviate rate shock on consumers and “mitigate the effect of these enormous bill increases.” Tr. of Comm’n Bench Session at 32 (Dec. 21, 2011). One Commissioner stated: “it is appropriate for us to . . . figure out . . . [how] this rate increase could be smoothed so the pocketbooks of the ratepayers are – they will be damaged, but at a less astounding speed.” *Id.* at 35. The parties agreed that the 50% rate increase for Lake Holiday was not so great as to constitute rate shock and no party recommended a phase-in or rate mitigation plan for that Utility.

In regard to Great Northern and Camelot, the People’s witness Mr. Brosch testified that “[t]he magnitude of the approved increases is unusually great, requiring a phase-in approach to enable consumers to accommodate and accept the much higher revenue levels that have been found to be needed.” AG Ex. 2.0 on Reh’g at 3. Mr. Brosch proposed a rate mitigation phase-in plan that “properly balances ratepayer and Company interests both by gradually increasing rates over time to give consumers time to adjust their usage and spending and by compensating the Companies for the time value of money during that period of deferral.” AG Ex. 2.0 on Reh’g at 15.

Mr. Brosch’s proposed phase-in plan would increase rates either by \$10 per month per year (equaling \$120 per year) or 20% of an average bill per year, whichever is greater. AG Ex. 2.0 on Reh’g at 9. Each year the utility could defer for future recovery the amount of revenue

that exceeds these guidelines. In summary, the phase-in would take between 0 and 10 years, as shown below:

**Table 2: Phase-in Schedule**

Utility Name	Percentage Increase	Number of Years for Phase-In
Great Northern Water	254%	9 years
Camelot Water	215%	10 years
Camelot Sewer	89%	6 years
Lake Holiday Water	50%	0 years

Sources: AG Ex. 2.0 on Reh’g at 14-15; AG Ex. 2.3 on Reh’g. Mr. Brosch suggested a 6.6% carrying charges on the net of tax regulatory asset balance containing deferred O&M expenses for which rate recovery has been delayed. AG Ex. 2.0 on Reh’g at 13. This proposal recognizes the tax benefits associated with the deferred revenue collection because the Company will incur deductible expenses in advance of the collection of revenue for that period. Utilities witness Neyzelman used the same approach in his calculation of carrying charges, albeit at a higher rate.

The People also presented the testimony of Scott J. Rubin. Mr. Rubin has testified extensively in connection with utilities that serve multiple rate areas, both in Illinois and in other states. *Id.* at 3; *see, e.g., Aqua Ill.*, ICC Docket 11-0436, Order at 40, 43-44 (Feb. 16, 2012); *Ameren Utilities*, ICC Docket 10-0517, Order at 15-18 (Mar. 15, 2011); *Ill. Am. Water Co.*, ICC Docket 09-0319, Order at 154, 160, 165 (April 13, 2010); *Ill. Am. Water Co.*, ICC Docket 02-0690, Order at 90, 97 (Aug. 12, 2003). Mr. Rubin testified that the Utilities are owned by Utilities, Inc. (“UI”), which in total owns 23 water and/or sewer systems in Illinois. He recommended that the Commission investigate UI’s entire 23 system Illinois service area to

determine whether there are rate mitigation possibilities on a company-wide basis. AG Ex. 3.0 on Reh'g at 5-7.

Staff witness Phillip Rukosuev agreed that an investigation into UI's statewide operations could provide the Commission with tools to alleviate rate shock and address other system issues. and testified in his rebuttal testimony that "[g]enerally speaking, I agree with Mr. Rubin's recommendation" to investigation UI. Staff Ex. 18.0 Rev. at 3. In his direct testimony, he pointed out the following considerations in connection with consolidation:

The Commission should encourage UI to seriously consider some form of consolidation of its 23 water and wastewater subsidiaries in Illinois. Consolidation would create increased efficiencies and has proven successful for other water utilities (For example, Aqua Illinois and Illinois American Water Company have consolidated its separate water and sewer divisions over the years.) Consolidation may also be beneficial for UI customers because not only may it protect them against dramatic rate increases but is also useful to address smaller system viability issues. Customers will also benefit from decreased rate case and administrative expenses due to the UI's ability to file single, consolidated rate cases for its many water and sewer operations.

Staff Ex. 17.0 Rev. at 10-11. Mr. Rukosuev recommended that "the Commission initiate a proceeding that would investigate, or require UI to show cause, regarding how to best address the issue of UI rate shock." Staff Ex. 18.0 Rev. at 6-7.

Utilities witness Neyzelman did not oppose an investigation into company-wide rate mitigation possibilities, and testified that the "Companies will look at the possibility of consolidating certain Illinois subdivisions in the future." Utilities Ex. 2.0 on Reh'g at 5.

In addition to addressing an investigation into consolidation, Staff witness Rukosuev presented a phase-in plan that differs from the plan proposed by Mr. Brosch. Although not supporting a phase-in, Mr. Rukosuev presented a phase-in plan, which he called a "rider bill stabilization" adjustment. Staff Ex. 17.0 on Reh'g at 14. His proposal would phase in rate increases for Great Northern and Camelot water and Camelot sewer over three years with rates



capped at 60% of the approved rate in the year 2012, 75% in 2013, and 90% in 2013. *Id.* at 15. The difference between the charged and approved rates from those first three years would then be billed to customers from 2015 to 2017, accruing an interest rate of 3.2%, which represents a weighting between the cost of short term debt and long term debt. *Id.* at 15-16. Thus under the Staff proposal, the rate increase for Great Northern and Camelot would be phased in over a six year period, unlike the People's proposal, where the phase-in period would vary for each Utility. The deferred charges and interest expense would be less under the Staff-designed plan, making consumer bills less expensive in the later recovery years than in Mr. Brosch's plan, while bills in the initial years would be higher.

Mr. Rukosuev suggested that customers have the option to join the phase-in plan, but that new customers be excluded. *Id.* at 16. He testified that customer education information, including outreach efforts and bill impacts, was important to the success of the plan, *id.* at 17, but no such materials are included in the record. He testified at the hearing that he did not know the cost of an opt-in or voluntary plan versus a plan that applies the same phase-in rate to all customers. Tr. at 72-73 (Feb. 29, 2012).

The witness for the Utilities declined to offer a specific phase-in plan or other rate mitigation plan. Utilities Ex. 1.0 on Reh'g at 1-2. However, Mr. Neyzelman acknowledged on cross-examination that other Utilities, Inc. water utilities have adopted phase-in plans for increases considerably less than those in these dockets. UI has been ordered to implement rate phase-in plans in both Tennessee and Maryland to address rate increases that were substantially smaller than the ones the utilities request in this docket. In Tennessee, the utilities requested an increase of about 70%. (Tr. at 24-25, Feb. 29, 2012). In Maryland, the utilities requested increases ranging from 38-47% for water services and 70% for sewer services.

The People asserted that a phase-in plan is necessary to mitigate rate shock, and that a follow-up investigation into UI's total Illinois operations is necessary to identify further rate mitigation options. The People propose that the Commission adopt Mr. Brosch's phase-in plan, but do not object to the shorter phase-in plan proposed by Staff, with the caveat that whatever phase-in plan the Commission adopts should not be optional unless the costs associated with an elective plan are small. If the cost of an elective phase-in is undetermined, the People recommend first that the plan apply to all customers and in the alternative, recommend that the Commission allow the Utilities to choose to offer the plan on an option basis, but without guaranteed recovery of administrative costs.

### **Commission Conclusion**

The Commission concludes that rate increases of the magnitude allowed in this docket require a phase-in plan to mitigate the effect on consumers. Increases that exceed 200% and that suddenly drive rates up to among the highest in the state require the Commission to adopt extraordinary measures to protect consumers' access to vital utility services. We are charged with balancing ratepayer and shareholder interests, as well as with applying established regulatory policies and principles. The avoidance of rate shock, and the associated principle of gradualism support our decision to require Great Northern and Camelot Utilities to phase-in the rate increases we have allowed. In light of our decision that a phase-in is necessary to alleviate rate shock in this case, we turn to the various details of the plans and the arguments of the parties.

### **III. PHASE-IN PLANS**

As described above, there are two phase-in plans before the Commission. Both plans will mitigate the burden on consumers, and both plans provide carrying charges payable to the

Utilities on the deferred revenue. The proposal made by AG witness Brosch has the advantage of smoothing out the rate increases in a more gradual way, with steady increases of \$10 or 20% (whichever is greater) over the time necessary to reach the authorized revenue levels. The People pointed out that although the phase-in period can last up to 10 years, Great Northern operated at its former revenue level for 13 years before seeking a rate increase, and Camelot operated at its former rate levels for 18 years. The 10 year phase-in is not unreasonable in light of the length of time since the last rate case. The People also point out that these rates are among the highest in the state, and it is unreasonable to anticipate that they will increase much more in the near term.

Although the People prefer the plan proposed by Mr. Brosch, the People do not object to the Commission adopting the phase-in plan proposed by Staff witness Rukosuev. Although the increases will be steeper in the early years, because the phase-in period is shorter, there are less carrying charges and the final rate paid by consumers to recover deferred revenues is less.

The Camelot Homeowners Association also submitted testimony on rehearing requesting that a phase-in plan be adopted. Their ten pieces of testimony demonstrate the range of hardships that this large increase will create, including absorbing a week's food budget (Ex.7.0 and 8.0), eliminating children's and family activities (Ex. 1.0, 10.0), need to obtain a second job (Ex. 10.0), cutting into an already fixed income (Ex. 3.0, 5.0, 6.0, 7.0), and considering sale, although the high water bill will hurt sales prospects. (Ex. 3.0, 6.0, 9.0).

### **Commission Conclusion**

The Commission adopts the phase-in plan proposed by Mr. Brosch. It smoothes out the rate increases and is consistent with the fundamental principle of gradualism. The steady increase in rates will allow consumers to acclimate to the higher rate levels and take the

necessary steps to alleviate their impact, such as installing efficient appliances, changing wasteful habits, and otherwise limiting usage to control their bills. Although the Staff proposal is also reasonable, the first step of the increase at 60% of the total increase would more than double consumers' bills, and therefore not address rate mitigation to the extent that we believe is necessary.

#### **IV. THE INTEREST RATE ON THE DEFERRED REVENUES**

The Company argues that if there is a phase-in plan, the interest rate should be equal to its weighted cost of capital, or 7.71% and that any lesser amount would amount to confiscation. AG witness Brosch recommended a 6.61% interest rate applicable to the balance of deferred revenues less the accumulated deferred income tax advantage stemming from the deduction of O&M costs prior to the receipt of revenues for the same period. The Staff recommends a combined cost of short and long term debt of 3.20%, which Staff asserts recognizes that under its plan, revenues will be deferred for a short period of time. Staff Exhibit 17.3 Revised shows that the first year of the recovery period, the Company will receive more than the amount deferred in the first year, showing that the deferred recovery will be less than three years. See Tr. at 70-71.

The Utilities also argue that a phase-in plan constitutes retroactive ratemaking. In response, the People pointed out that they have not recommended that the revenue requirement be changed based on information discovered at a later point in time. See *Citizens Utils. Bd. v. Ill. Commerce Comm'n*, 124 Ill. 2d 195, 210-11 (1988). The People also reject the notion that a phase-in plan is "equivalent to a refund of revenues previously approved for a prior period," because phase-in rates start with a new rate order that will recover the total revenue requirement approved over the phase-in period – whether it is the phase-in plan designed by Mr. Brosch or the one designed by Mr. Rukosuev.

## Commission Conclusion

The Commission concludes that the interest rate associated with the proposed plan will be adopted. As we adopt the phase-in proposal of Mr. Brosch, we will utilize his interest rate and calculation method.

We further reject the Utilities argument that the interest rate adopted herein for the deferred revenues amounts to confiscation. The Utilities mistake an authorized return for a guaranteed return. In a case like this where the increases are excessive and shocking to consumers, the Commission can adjust the required return so long as it specifies what the final amount of each is. *Camelot Utilities v. Illinois Commerce Commission*, 51 Ill.App.3d 5, 9, 365 N.E.2D 312, 315 (1977). In that opinion, also involving Camelot Utilities, the Illinois Appellate Court stated: “While the rates allowed can never be so low as to be confiscatory, within this outer boundary, if the rightful expectations of the investor are not compatible with those of the consuming public, it is the latter which must prevail.” *Camelot Utilities v. Illinois Commerce Commission*, 51 Ill.App.3d 5, 10, 365 N.E.2D 312, 315 (1977).<sup>1</sup> We find that the interest rate on the deferred revenues is well within the range of permissible returns, and is specifically calculated to reflect the cost of money for the period of time that it will be due.

Our conclusion is consistent with the United States Supreme Court’s pronouncement in the Bluefield Water Works case in which the Court held that a reasonable return is not the highest return, and that there is “no constitutional right to profits such as are realized or

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<sup>1</sup> See also *State Public Utilities Commission v. Springfield Gas & Elec. Co.*, 291 Ill. 209, 216 -217 (Ill.1919), where the Court “said that a just and reasonable rate can never exceed-perhaps an rarely equal-the value of the service to the consumer, and on the other hand it can never be made by compulsion of public authority so low as to amount to confiscation; that a just and reasonable rate must therefore certainly fall between these two extremes, so as to allow both sides to profit by the conduct of the business and the improvement of methods and increase of efficiency; that justice to the consumer, ordinarily, would require a rate somewhat less than the full value of the service to him, and justice to the company would ordinarily require a rate above the point at which it would become confiscatory.”

anticipated in highly profitable enterprises or speculative ventures.” *Bluefield Water Works*, 262 U.S. 679 (1923). So long as the Commission specifies the basis for the lower return on the deferred balances, it has complied with both the 1977 *Camelot* case and the *Bluefield* case.

The Commission also concludes that a phase-in plan does not constitute retroactive ratemaking. The plan will recognize and is designed to collect the authorized revenue requirement, including carrying charges on the deferred revenues. We are not revising the revenue requirement approved in our November 8 order, and the rates we approve will be designed to collect that revenue requirement, just over a longer time period.

## **V. COST OF SERVICE**

Both the Utilities and the Staff argue that the Commission should not adopt a phase-in rate shock mitigation plan because the Utilities’ cost of service requires that its entire revenue requirement be reflected in rates. They assert that the Utilities will not have the resources needed to offer safe and reliable service if rates are phased in.

In response, the People point out that no Utilities or Staff witness identified any specific function or investment that would be postponed or foregone if a phase-in plan were adopted. The People noted that these systems are exceedingly small: Great Northern has only 360 connections, and Camelot has approximately 200 connections. During the period prior to these rate cases, Great Northern’s rate base increased from \$190,356 to \$1,363,881 or more than 600% and Camelot’s water and sewer rate base increased from \$588,213 to \$1,630,362 or more than 175%. See Order at 6 & App. B for Great Northern and Camelot Water and Sewer. The People questions whether these tiny systems should expect to be burdened with yet more investments in the near term. The People assert that it is simply not credible that these systems will need so much more revenue in the near term, and emphasize that these assertions are made without any

specific record evidence. Finally, the People are concerned that if additional major investments are made, real questions of affordability will arise, as will questions as to whether those investments are used and useful and prudent.

The People also state that these very small systems are part of a larger organization, Utilities, Inc. (“UI”), which owns 23 other systems in Illinois and 70 systems throughout 15 states. GN Ex. 1.0 at 2-3; Camelot Ex. 1.0 at 2-3. The Utilities’ parent, UI, provides all services, costs, and investments through its Water Services Corporation and allocates all costs to these systems. GN Ex. 1.0 at 1; Camelot Ex. 1.0 at 1. Investment decisions are made centrally, and were made during the past 13 (Great Northern) and 18 years (Camelot) notwithstanding years when the Utilities received less than their cost of capital. Tr. 41 (July 13, 2011). The phase-in proposals are for 6 or 9-10 years, considerably less time than the prior rates were in place. The People maintain that it is clear that these Utilities can operate in situations when their rates are less than their out-of-pocket expenses, allocated expenses and their investment needs.

### **Commission Conclusion**

The Commission concludes that the rate phase-in will not interfere with the Utilities ability to offer safe and reliable service. In addition to the fact that the deferred revenues will be collected in the near future, these Utilities have shown that they can operate at less than optimal revenue levels. Further, we will initiate an investigation into the entire UI system, which will give us an opportunity to review the Utilities and other UI costs and enable us to monitor the effect of the phase-in on the Utilities as well as on their affiliated Illinois companies.

## **VI. INVESTIGATION INTO UI**

Both the Staff and the People request that the Commission initiate an investigation into all of UI’s 23 systems in Illinois to determine whether there are efficiency, cost of service, and

rate mitigation options available. The Utilities did not express an objection to this proposal and it is adopted.

The Staff also raised the prospect of creating an increasing block rate structure, where usage above a certain level is charged at a higher rate. The Staff presented this as a cost of service issue and as a rate mitigation tool.

### **Commission Conclusions**

The Commission will initiate an investigation into the Utilities and their affiliation with other UI companies in Illinois within 60 days of the order in this case. The investigation will begin with workshops to attempt to identify the relevant and necessary information and determine how and when it will be provided. All parties to this docket will be notified when the investigation commences.

We decline to comment on whether an increasing block rate structure is an appropriate rate mitigation tool. We do not have the cost of service study or the billing determinants necessary to assess this option. However, this is one of the issues that can be raised in the investigation we will initiate.

We are confident that a full investigation will benefit Illinois consumers by identifying efficiencies and other rate mitigation strategies.

## **VII. FINDINGS AND ORDERING PARAGRAPHS (PARTIAL)**

- (1) The Commission finds that a rate mitigation plan is necessary for the Great Northern Water Company to mitigate the effect of the 256% increase in revenues we approved in our November 8, 2011 Order.
- (2) The Commission finds that that a rate mitigation plan is necessary for Camelot Utilities water and sewer service to mitigate the effect of the 212% increase in water



revenues and the 88% increase in sewer revenues we approved in our November 8, 2011 Order.

- (3) The Commission finds that the phase-in plan offered by AG witness Michael Brosch appropriately and gradually phases in the new, higher revenue requirement while also providing for a reasonable return on the the balance of deferred revenues less the accumulated deferred income tax advantage stemming from the deduction of O&M costs prior to the receipt of revenues for the same period, as shown in AG Ex. 2.0 on Rehearing, Schedule MLB-2.3 Rhg.
- (4) The Commission will initiate an investigation into the affiliates of the Utilities within 60 days of this Order. That investigation will address cost of service, efficiencies, and rate mitigation options available to Illinois consumers who take service from the Utilities and their affiliates. The Commission direct that a workshop of all interested parties take place when the investigation is initiated to determine the scope of the investigation as well as the information needed to proceed.
- (5) the Utilities shall otherwise perform all actions that this Order requires of them.
- (6) all remaining motions, petitions, objections, or other matters in this proceeding should be disposed of in a manner consistent with the conclusions reached herein;

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that the tariff sheets proposing a general increase in water and sewer rates filed by Great Northern Utilities, Inc., and Camelot Utilities, Inc on November 8, 2011 be, and the same are hereby, permanently canceled and annulled.

IT IS FURTHER ORDERED that Great Northern Utilities, Inc., and Camelot Utilities, Inc., file new tariffs within five (5) business days of the Order, with an effective date of not less than five (5) business days after the date of filing, except as otherwise authorized by Section 9-201(b) of the Public Utilities Act amended, for service rendered on and after their effective date, with individual tariff sheets to be corrected within that time period if necessary. The rates will be in accordance with the Findings above. Said new tariff sheets shall cancel the tariff sheets presently in effect for Great Northern Utilities, Inc., and Camelot Utilities.

By Order Of The Commission

This \_\_\_\_ Day Of May, 2012.

## CONCLUSION

The People respectfully request that the Commission adopt the foregoing language in its Order in these consolidated dockets.

Respectfully Submitted,

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